

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re: Equifax Inc. Customer  
Data Security Breach Litigation

MDL Docket No. 2800  
No. 1:17-md-2800-TWT

ALL ACTIONS

Chief Judge Thomas W. Thrash, Jr.

**AMENDED JOINT PRELIMINARY REPORT AND DISCOVERY PLAN**

Pursuant to Federal Rule of Civil Procedure 26, Local Rule 16.2, and Case Management Order No. 2 (ECF No. 87), the parties submit this Amended Joint Preliminary Report and Discovery Plan as follows.

Following the preliminary approval of the settlement of the Consumer Track case, the Plaintiffs in the Financial Institution Track and Defendants agree that certain modifications of the discovery schedule are necessary to allow the parties sufficient time to complete discovery as to the Financial Institution Track claims. Accordingly, the parties request that the Court enter the following amended deadlines:

<b>Event</b>	<b>Existing Deadline</b>	<b>Amended Deadline</b>
<b>Parties Serve Responses and Objections to RFPs and Begin Document Production</b>	Wednesday, February 27, 2019	Complete
<b>Beginning of Fact Discovery</b>	Friday, March 29, 2019	Complete
<b>Add Additional Parties and/or Amend Pleadings</b>	Monday, July 29, 2019	Complete

Event	Existing Deadline	Amended Deadline
<b>Substantial Completion of Document Production</b>	Monday, September 30, 2019	Monday, February 24, 2020
<b>Fact Discovery Closes</b>	Monday, December 30, 2019	Friday May 22, 2020
<b>Disclosure of Plaintiffs' Expert(s) and Serve Expert Report(s)</b>	Wednesday, January 29, 2020	Friday, June 12, 2020
<b>Disclosure of Equifax's Expert(s) and Serve Expert Report(s)</b>	Friday, February 28, 2020	Friday, July 10, 2020
<b>Disclosure of Plaintiffs' Rebuttal Expert(s) and Serve Rebuttal Expert Report(s)</b>	Friday, March 20, 2020	Friday, August 7, 2020
<b>Completion of Expert Discovery</b>	Tuesday, May 19, 2020	Friday, September 18, 2020
<b>Local Rule 16.3 Conference</b>	Tuesday, June 2, 2020	Monday, October 26, 2020
<b>Plaintiffs' Class Certification Motions to Be Filed in Consumer Track</b>	Tuesday, July 14, 2020	Removed
<b>Plaintiffs' Class Certification Motions to Be Filed in Financial Institutions Track</b>	Tuesday, July 28, 2020	Friday, October 16, 2020
<b>Oppositions to Plaintiffs' Class Certification Motions to Be Filed in Consumer Track</b>	Friday, August 28, 2020	Removed
<b>Oppositions to Plaintiffs' Class Certification Motions to Be Filed in Financial Institutions Track</b>	Friday, September 11, 2020	Wednesday, November 18, 2020

Event	Existing Deadline	Amended Deadline
<b>Replies in Support of Plaintiffs' Class Certification Motions to Be Filed in Consumer Track</b>	Monday, September 28, 2020	Removed
<b>Replies in Support of Plaintiffs' Class Certification Motions to Be Filed in Financial Institutions Track</b>	Monday, October 12, 2020	Friday, December 18, 2020
<b>Summary Judgment Motions to Be Filed in the Consumer Track</b>	Tuesday, September 22, 2020	Removed
<b>Summary Judgment Motions to Be Filed in the Financial Institutions Track</b>	Tuesday, October 6, 2020	Friday, January 29, 2021
<b>Opposition to Summary Judgment Motions to Be Filed in Consumer Track</b>	Thursday, October 22, 2020	Removed
<b>Opposition to Summary Judgment Motions to Be Filed in Financial Institutions Track</b>	Thursday, November 5, 2020	Friday, March 5, 2021
<b>Reply in Support of Summary Judgment Motions to Be Filed in the Consumer Track</b>	Thursday, November 12, 2020	Removed
<b>Reply in Support of Summary Judgment Motions to Be Filed in the Financial Institutions Track</b>	Friday, November 27, 2020	Friday, March 26, 2021

Respectfully submitted,  
September 12, 2019

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## **CERTIFICATION**

The Undersigned hereby certifies, pursuant to Local Civil Rule 7.1D, that the foregoing document has been prepared with one of the font and point selections (Times New Roman, 14 point) approved by the Court in Local Civil Rule 5.1C.

This 12th day of September, 2019.

/s/ Joseph P. Guglielmo  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this 12th day of September, 2019, the undersigned electronically filed the foregoing filing using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record in this case.

/s/ Joseph P. Guglielmo  
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## **SCHEDULING ORDER**

Upon review of the information contained in the Amended Joint Preliminary Report and Discovery Plan form completed and filed by the parties, the Court orders that the time limits for adding parties, amending the pleadings, filing motions, completing discovery, and discussing settlement are as set out in the Federal Rules of Civil Procedure and the Local Rules of this Court, except as herein modified

**IT IS SO ORDERED.**

Date: \_\_\_\_\_, 2019

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Thomas W. Thrash  
United States District Judge